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**AIR and WASTE
MANAGEMENT**

Ms. Siew Kour
Kansas Department of Health and Environment
Hazardous Waste Section
Forbes Field, Building 740
Topeka, Kansas 66620-0002

Dear Ms Kour:

This letter will describe for Kansas Department of Health and Environment (KDHE) the activities at Hydrocarbon Recyclers, Inc. of Wichita that HRI of Wichita believes fall under the description of "treatment in containers and container management activities" shown in Item XIII, Line 08 of the 9 May 1991 Part A application submitted to KDHE. This description is being sent to assist you in completing your review of said Part A application.

These activities are mainly for the purpose of changing the container type or size to allow proper or disposal or more efficient handling of the packaged waste material. Included in these repackaging activities are:

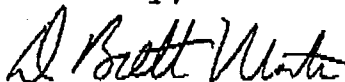
- lab pack container repackaging, in which laboratory scale quantities of chemicals are compatibly combined for recycling, incineration, kiln fuel use, or other disposal;
- kiln fuel solids repackaging, in which solids are transferred into smaller containers that can be used as kiln fuel charges;
- transferring drummed solids into gondolas for safer and more economical transport to landfill facilities where this material will be disposed;
- transferring drummed liquids into tanker trucks for offsite shipment and disposal;
- transferring material from drums that show signs of deterioration to new drums, or transferring incinerables from steel drums to approved poly drums to allow easier incineration; and
- when shipping requirements allow, repackaging friable solids to be disposed in bulk processes into fiber boxes or bags that better accomodate the disposal handling technology.

Clarification of 5/9/91 Part A Application
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One additional activity that falls within the description, "treatment in containers and container management activities," is absorption or solidification of small quantities of liquid or sludge in drums of solids. Occasionally HRI of Wichita receives such liquids and/or sludge as a result of a temperature dependent phase change, or of incomplete mixing by the generator. To make the material more amenable to proper transportation or to satisfy the need of the disposal facility for a uniform material, HRI of Wichita may choose to absorb or solidify incidental liquids with fly ash, cement, or an alternative non-reactive absorbent material. This activity is not intended to change the treatment and/or disposal option for the waste stream.

Please call Steve Keiter (316-268-9490) or me if you are left with any other questions regarding these activities.

Sincerely,



D. Brett Morton
Director of Regulatory Affairs